



**COLORADO**  
**DEPARTMENT**  
**OF HEALTH**

May 15, 1991

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Re: Environmental Evaluation Phase I RFI/RI Work  
Plan - Woman Creek Priority Drainage

Dear Mr. Lockhart:

We have reviewed the Final Draft of the Environmental  
Evaluation Phase I RFI/RI Work Plan - Woman Creek  
Priority Drainage (EE).

In conjunction with the draft document there have been  
several meetings among DOE, EG&G, EPA and the CDH  
staff to discuss issues and procedural matters  
concerning this effort, the most recent May 8, 1991.

These meetings have served to convey the changes  
needed in the workplan and an understanding of the  
process(s) to be used in the evaluation. Written  
material was provided by the State to Lawrence Woods  
and Tom Ottensman of EG&G at the May 8, 1991 meeting.

The material consisted of general and specific issues  
relative to environmental evaluations and water  
management planning, and contaminant lists. The  
material consisted of:

- \* General observations from the "Interim  
Remedial Investigations for Operable Units  
1 and 2", the "Background Geochemical  
Characterization Report", and the "Draft  
Rocky Flats Surface Water Management Plan",  
and
- \* An outline titled ROCKY FLATS ENVIRONMENTAL  
ASSESSMENT AND WATER QUALITY MANAGEMENT  
PLANNING PROCESS which details steps  
typically followed with Region VIII EPA for  
water quality assessment, and

- \* The TASK I REPORT from the DOSE RECONSTRUCTION PROJECT which is a review detailing potential contaminants with public health significance used at Rocky Flats and a subsequent screening of the lists. Also the list of Hazardous Material list from the IAG Appendix was submitted. These lists deal primarily with health based risks rather than environmental risks.

The following comments are intended to compliment the written material and verbal comments made on May 8, 1991.

- \* The revised format and content of the workplan should attempt to consolidate general task areas to minimize duplication, and delete general references and discussions. The final workplan should attempt to consolidate efforts to complete a baseline assessment of the specific area, with historical data and acquisition of data, needed to complete a conceptual model of the operable units and the site.

The nature of data needed for a baseline assessment of the aquatic community are contained in the ROCKY FLATS ENVIRONMENTAL ASSESSMENT AND WATER QUALITY MANAGEMENT PLANNING PROCESS.

- \* The lists of contaminants did not include certain parameters of environmental concern;

nutrient loading of organic, nitrogen and phosphate species, and

toxicity of heavy metals and ammonia to aquatic life.

- \* The assessment of existing data should recognize effluent, surface water, ground water, and sediment data from the water management group. In addition the state has air, soil and water radiological data back to 1969 which needs to be included. (You may contact Rob Terry of the Radiological Health Division of CDH regarding this data at 331-4816.) The CDH Consumer Protection Division should be contacted with respect to data on milk produced in the area and other consumer product data that may exist. The neighboring cities, USGS and the Colorado Division of Wildlife (CDOW) also have data available. David Weber 291-7231 should be contacted at the CDOW for their results of past work and input on future work in the aquatic communities, terrestrial life and plant communities in the area. Since July of 1989 the State Health department has sampled for organics in the area. The Water Quality Division of the CDH has completed a fish flesh study of Standly Reservoir. (Bob McConnell 331-4578).
- \* The EE Workplan should provide detailed location of all stations or areas selected for physical, chemical and biological sampling, past and future sampling. (We would like to receive the coverage in a DXF ascii electronic file format, if possible.)
- \* Models selected and ecotoxicological sampling will influence data needs and identify data gaps to a large extent. The workplan should include a preliminary assessment of all the models intended to be used. The models selected should indicate how specific questions will be answered through interpretations of the data. The level of reliability desired in the models and acceptable degree of uncertainty need to be agreed upon early. These are issues relevant to the design of a sampling plan.
- \* The air models may be critical components of transport mechanisms at this site. Our Air quality control Division should be contacted regarding modeling efforts. Contact Richard Fox at 331-6731.

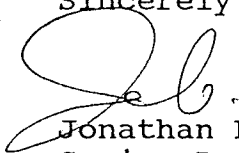
- \* The human health risks evaluations and exposure models selected may affect the sampling plan and interpretations made of the data. Contact Normi Morin at 331-6732 concerning these issues.
- \* Attention needs to be given to the electronic data file structure for all of the historical and future data. The State and EPA will wish to receive the data in electronic format and coverage files for independent analysis and interpretations. We have initiated discussions with our EPA counterparts on this issue and are working with Steve Singer of RFP Data Management Group on some of the files and converges.

The breadth of data and stations create the need to evaluate selected data over time and distance, requiring a good database file structure. The base imputing system and outputs of the data will be critical to timely communications and decisions among the parties.

- \* Insure the methods selected for sampling and analysis are referenced in workplans either directly to an approved EPA method or the section of the appropriate SOP.

Please feel free to contact this office with any questions or concerns you may have regarding these comments.

Sincerely yours,



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Senior Professional Engineer

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Joe Schieffelin	CDH
Debbie Mauer	CDH
Normi Morin	CDH